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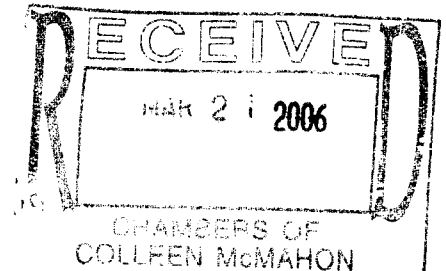
William R. Bennett, III Partner

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March 21, 2006  
Via Fax 914.390.4152

(Our File: D492)

Hon. Colleen McMahon  
United States District Judge  
United States Courthouse  
300 Quarropas Street, Room 533  
White Plains, New York 10601-4150



Re: **Vasquez, et al. v. Torres-Negron, et al.**  
06-cv-00619 (CM)(MDF)

*But fact is  
not here I am  
my citizenship  
place.*

Dear Judge McMahon:

**MEMO ENDORSED**

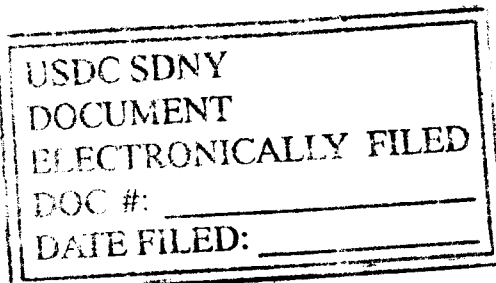
We represent the defendants in the referenced matter and write to kindly request and adjournment of the scheduling conference presently scheduled for this Friday, March 24, 2006.

The parties have not submitted a Consent Scheduling Order, however, counsel have discussed this matter on several occasions. Plaintiff has agreed to voluntarily dismiss the Complaint as against defendants Tamara Sosa-Pascual and Julio De La Rosa-Rive. With respect the remaining defendant, Fernando Torres Negron, we intend to file motion to dismiss the Complaint pursuant to Rule 12(b)(2) (lack of personal jurisdiction), Rule 12(b)(3)(improper venue) and Rule 12(b)(6)(failure to state a claim) by the end of the month. We believe it would be more judicious to adjourn the scheduling conference until such time that the voluntary dismissal is filed and the Rule 12(b) motions have been decided. In addition, the undersigned will be out of the country until next Monday starting tomorrow.

Respectfully submitted,

*[Signature]*  
William R. Bennett, III

cc: James Shienbaum, Esq.  
(by fax: 212.687.8710)



*Engagement scheduled  
5/19/06 at 10:15 AM*